

ERIC L. CRAMER (*Pro hac vice*)  
 BERGER MONTAGUE PC  
 1818 Market Street, Suite 3600  
 Philadelphia, PA 19103  
 Telephone: (215) 875-3000  
 Facsimile: (215) 875-4604  
 ecramer@bm.net

JOSEPH R. SAVERI (*Pro hac vice*)  
 JOSEPH SAVERI LAW FIRM, LLP  
 601 California Street, Suite 1200  
 San Francisco, California 94108  
 Telephone: (415) 500-6800  
 Facsimile: (415) 395-9940  
 jsaveri@saverilawfirm.com

RICHARD A. KOFFMAN (*Pro hac vice*)  
 COHEN MILSTEIN SELLERS & TOLL,  
 PLLC  
 1100 New York Ave., N.W., Suite 500, East  
 Tower  
 Washington, DC 20005  
 Telephone: (202) 408-4600  
 Facsimile: (202) 408 4699  
 rkoffman@cohenmilstein.com

*Counsel for the Proposed Class and  
 Attorneys for All Individual and  
 Representative Plaintiffs*

[Additional Counsel Listed on Signature  
 Page]

CHRISTOPHER S. YATES (*Pro hac vice*)  
 chris.yates@lw.com  
 LATHAM & WATKINS LLP  
 505 Montgomery Street, Suite 2000  
 San Francisco, CA 94111

WILLIAM A. ISAACSON (*Pro hac vice*)  
 wisaacson@paulweiss.com  
 JESSICA PHILLIPS (*Pro hac vice*)  
 jphillips@paulweiss.com  
 PAUL, WEISS, RIFKIND, WHARTON &  
 GARRISON LLP  
 2001 K Street, NW  
 Washington, DC 20006

DONALD J. CAMPBELL  
 J. COLBY WILLIAMS  
 CAMPBELL & WILLIAMS  
 710 South Seventh Street, Ste. A  
 Las Vegas, NV 89101  
 Telephone: (702) 382-5222  
 Facsimile: (702) 382-0540  
 Email: djc@cwlawlv.com  
 Email: jcw@cwlawlv.com

*Attorneys for Defendant Zuffa, LLC, TKO  
 Operating Company, LLC, and Endeavor  
 Group Holdings, Inc.*

[Additional Counsel Listed on Signature  
 Page]

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

Kajan Johnson, Clarence Dollaway, and  
 Tristan Connelly, on behalf of themselves  
 and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, TKO Operating Company, LLC  
 f/k/a Zuffa Parent LLC (d/b/a Ultimate  
 Fighting Championship and UFC) and  
 Endeavor Group Holdings, Inc.,

Defendants.

**No.: 2:21-cv-01189-RFB-BNW**

**JOINT SCHEDULING STIPULATION FOR  
 DEFENDANTS' MOTION TO DISMISS  
 PLAINTIFFS' AMENDED ANTITRUST  
 CLASS ACTION COMPLAINT**

**(THIRD REQUEST)**

Plaintiffs Kajan Johnson, Clarence Dollaway, and Tristan Connelly (“Plaintiffs”) and Defendants Zuffa, LLC, TKO Operating Company, LLC, and Endeavor Group Holdings, Inc. (“Defendants,” and collectively with Plaintiffs, the “Parties”), submit this stipulation on a briefing schedule for Defendant Endeavor’s motion to dismiss Plaintiffs’ Amended Antitrust Class Action Complaint (“Amended Complaint”). On December 1, 2023, Defendant Endeavor Group Holdings, Inc. (“Endeavor”) filed its Second Motion to Dismiss Plaintiffs’ initial Antitrust Class Action Complaint. ECF No. 112. In lieu of responding to that motion, on December 15, 2023, Plaintiffs filed their Amended Complaint. ECF No. 118.

On December 20, 2023, the Parties filed a joint stipulation regarding a briefing schedule on Defendants’ motion to dismiss the Amended Complaint, ECF No. 119, which the Court granted on January 2, 2024. ECF No. 120.

On January 26, 2024, the Parties filed a second joint stipulation regarding a briefing schedule on Defendants’ motion to dismiss the Amended Complaint, ECF No. 126, which the Court granted on January 29, 2024. ECF No. 127.

On February 5, 2024, Defendant Endeavor filed its Third Motion to Dismiss, ECF No. 128, and Defendants Zuffa, LLC and TKO Operating Company, LLC filed their Answer to the Amended Complaint. ECF No. 129.

In light of the ongoing trial preparations in *Le, et al. v. Zuffa, LLC*, No. 15-cv-0145 (D. Nev.), which is scheduled to begin on April 15, 2024, and for good cause shown, the Parties have conferred and agreed to the following briefing schedule for Defendant Endeavor’s Third Motion to Dismiss:

Case Event	Date
Plaintiffs’ Opposition Due	Monday, April 1, 2024
Defendants’ Reply Due	Thursday, May 9, 2024

This is the third request for an amendment of the motion to dismiss briefing deadlines, and the foregoing stipulation does not affect any other existing Court deadlines or scheduling previously set in this case or in *Le, et al. v. Zuffa, LLC*, No. 15-cv-0145 (D. Nev.).

Respectfully Submitted,

Dated: February 28, 2024

By: /s/ Eric L. Cramer

Eric L. Cramer (*Pro hac vice*)  
 Michael Dell'Angelo (*Pro hac vice*)  
 Ellen T. Noteware (*Pro hac vice*)  
 Patrick F. Madden (*Pro hac vice*)  
 Najah Jacobs (*Pro hac vice*)  
 BERGER MONTAGUE PC  
 1818 Market St., Suite 3600  
 Philadelphia, PA 19103  
 Telephone: +1 (215) 875-3000  
 Email: ecramer@bm.net  
 Email: mdellangelo@bm.net  
 Email: enoteware@bm.net  
 Email: pmadden@bm.net  
 Email: njacobs@bm.net

Joshua P. Davis (*Pro hac vice*)  
 BERGER MONTAGUE PC  
 505 Montgomery Street, Suite 625  
 San Francisco, CA 94111  
 Telephone: +1 (415) 906-0684  
 Email: jdavis@bm.net

Richard A. Koffman (*Pro hac vice*)  
 Benjamin Brown (*Pro hac vice*)  
 Daniel Silverman (*Pro hac vice*)  
 COHEN MILSTEIN SELLERS  
 & TOLL PLLC  
 1100 New York Ave., N.W.  
 Suite 500 East, Tower  
 Washington, DC 20005  
 Telephone: +1 (202) 408-4600  
 Facsimile: +1 (202) 408-4699  
 Email: rkoffman@cohenmilstein.com  
 Email: bbrown@cohenmilstein.com  
 Email: dsilverman@cohenmilstein.com

By: /s/ David L. Johnson

CHRISTOPHER S. YATES (*Pro hac vice*)  
 chris.yates@lw.com  
 LATHAM & WATKINS LLP  
 505 Montgomery Street, Suite 2000  
 San Francisco, CA 94111  
 Tel: (415) 395-8095

SEAN M. BERKOWITZ (*Pro hac vice*)  
 sean.berkowitz@lw.com  
 LATHAM & WATKINS LLP  
 330 North Wabash Ave, Suite 2800  
 Chicago, IL 60611

LAURA WASHINGTON (*Pro hac vice*)  
 laura.washington@lw.com  
 LATHAM & WATKINS LLP  
 10250 Constellation Blvd, Suite 1100  
 Los Angeles, CA 90067

DAVID L. JOHNSON (*Pro hac vice*)  
 david.johnson@lw.com  
 LATHAM & WATKINS LLP  
 555 Eleventh Street NW, Suite 1000  
 Washington, D.C. 20004

WILLIAM A. ISAACSON (*Pro hac vice*)  
 wisaacson@paulweiss.com  
 JESSICA PHILLIPS (*Pro hac vice*)  
 jphillips@paulweiss.com  
 PAUL, WEISS, RIFKIND, WHARTON &  
 GARRISON LLP  
 2001 K Street, NW  
 Washington, DC 20006

BRETTE M. TANNENBAUM (*Pro hac vice*)  
 btannenbaum@paulweiss.com  
 YOTAM BARKAI (*Pro hac vice*)  
 ybarkai@paulweiss.com  
 PAUL, WEISS, RIFKIND, WHARTON &  
 GARRISON LLP  
 1285 Avenue of the Americas  
 New York, NY 10019

1 Joseph R. Saveri (*Pro hac vice*)  
2 Christopher Young (*Pro hac vice*)  
3 Kevin E. Rayhill (*pro hac vice*)  
4 JOSEPH SAVERI LAW FIRM, INC.  
5 601 California St., Suite 1000  
6 San Francisco, CA 94108  
7 Telephone: +1 (415) 500-6800  
8 Facsimile: +1 (415) 395-9940  
9 Email: jsaveri@saverilawfirm.com  
10 Email: krayhill@saverilawfirm.com  
11 Email: cyoung@saverilawfirm.com  
12 Don Springmeyer (Bar No. 1021)

13 KEMP JONES, LLP  
14 3800 Howard Hughes Parkway, 17th Floor  
15 Las Vegas, Nevada 89169  
16 Telephone: + 1 (702) 385-6000  
17 Facsimile: + 1 (702) 385-6001  
18 Email: dspringmeyer@kempjones.com

19 Robert C. Maysey (*Pro hac vice*)  
20 Jerome K. Elwell (*Pro hac vice*)  
21 WARNER ANGLE HALLAM JACKSON &  
22 FORMANEK PLC  
23 2555 E. Camelback Road, Suite 800  
24 Phoenix, AZ 85016  
25 Telephone: +1 (602) 264-7101  
26 Facsimile: +1 (602) 234-0419  
27 Email: rmaysey@warnerangle.com  
28 Email: jelwell@warnerangle.com

*Counsel for the Proposed Class and Attorneys  
for All Individual and Representative  
Plaintiffs*

DONALD J. CAMPBELL (No. 1216)  
djcc@campbellandwilliams.com  
J. COLBY WILLIAMS (No. 5549)  
jcw@campbellandwilliams.com  
CAMPBELL & WILLIAMS  
700 South 7th Street  
Las Vegas, Nevada 89101  
Tel: (702) 382-5222

*Attorneys for Defendant Zuffa, LLC, TKO  
Operating Company, LLC, and Endeavor  
Group Holdings, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Joint Scheduling Stipulation for Defendants' Motion to Dismiss Plaintiffs' Amended Antitrust Class Action Complaint was served on February 28, 2024, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Eric L. Cramer